

STATEMENT OF BASIS (AI No. 32615)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0106356 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Targa Midstream Services, L.P.
Delta Gathering Station
1565 Tidewater Road
Venice, Louisiana 70091

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: August 14, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A
NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LWDPs permit - (WP2963)
LWDPs permit effective date: December 30, 1993
LWDPs permit expiration date: December 29, 1998

D. LPDES permit - (LA0106356)
LPDES permit effective date: January 1, 2000
LPDES permit expiration date: December 31, 2005

E. Date Application Received: July 28, 2004

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - offshore crude oil and natural gas gathering station

Targa Midstream Services, L.P., Delta Gathering Station, is an existing crude oil and natural gas gathering station. Natural gas is gathered from many pipelines and is dehydrated and recompressed to the pressure needed to send it to the process plant.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1321

C. LOCATION - 1565 Tidewater Road, Venice, Plaquemines Parish
Latitude 29°13'24", Longitude 89°23'39"

3. OUTFALL INFORMATION

Outfall 001

This outfall was a previous stormwater outfall. This outfall is being removed from the permit based on a review of DMR's that indicated there were no excursions for the outfall for the last two years. Stormwater will now be addressed in the Stormwater Pollution Prevention Plan (SWP3) language in this permit.

Outfall 002

This outfall was a previous stormwater outfall. This outfall is being removed from the permit based on a review of DMR's that indicated there were no excursions for the outfall for the last two years. Stormwater will now be addressed in the Stormwater Pollution Prevention Plan (SWP3) language in this permit.

Outfall 003

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant with chlorination
Location: at the point of discharge from the sewage treatment
plant located on the east side of the facility
(Latitude 29°13'30", Longitude 89°23'30")
Flow: 1388 gpd
Discharge Route: directly into Red Pass

Outfall 004

Discharge Type: once-through non-contact cooling water
Treatment: none
Location: at the point of discharge from the solar heat exchangers
located on the northwest side of the facility
(Latitude 29°13'30", Longitude 89°23'30")
Flow: 2,330,000 gpd
Discharge Route: unnamed slip thence to Red Pass

Outfall 005

Discharge Type: once-through non-contact cooling water
Treatment: none
Location: at the point of discharge from the oil cooler exchangers
located on the northwest side of the facility (Outfall
005 is west of Outfall 006) (Latitude 29°13'30",
Longitude 89°23'30")
Flow: 259,000 gpd
Discharge Route: directly into Red Pass

Outfall 006 (This outfall used as an alternate to Outfall 004.)

Discharge Type: once-through non-contact cooling water
Treatment: none
Location: at the point of discharge from the solar heat exchangers
located on the northwest side of the facility (Outfall
006 is east of Outfall 005) (Latitude 29°13'30",
Longitude 89°23'30")
Flow: 2,330,000 gpd
Discharge Route: directly into Red Pass

4. RECEIVING WATERS

STREAM - unnamed slip thence to Red Pass

BASIN AND SEGMENT - Mississippi River Basin, Segment 070404

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. oyster propagation

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

An inspection was performed at the facility on April 7, 2005. The findings were as follows: (1) an LPDES permit renewal request was submitted on July 22, 2004. (2) the permit was onsite for review; (3) DMRs were onsite, reviewed for 2004, and no excursions were noted; (4) bromine tablets are used to treat for zebra mussels; (5) The SWPPP was onsite for review and implemented at the facility; (6) The SPCC plan was reviewed onsite and last updated on May 29, 2003; (7) secondary

containment is provided for storage tanks; (8) the aerator on the sewage treatment plant was operational, chlorine tablets were in the chlorinator tubes, and the clarifier appeared to be in adequate condition; (9) the effluent leaving the sewage treatment plant was slightly cloudy but odorless.

B. DMR Review/Excursions

A review of the DMR's for the last two years showed all DMR's had been submitted in accordance with the existing permit and the following excursion:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
4/05	TSS	003	52 mg/L	45 mg/L

7. Endangered Species:

The receiving waterbody, Subsegment 070404 of the Mississippi River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005, from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the factsheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Targa Midstream Services, L.P.

1. **Outfall 003 - treated sanitary wastewater** (estimated flow is 1388 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	---:Report	
BOD	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)*
TSS	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)*
Fecal Coliform	---400/100mL	LPDES General Permit LAG480000 (BPJ)*
pH	6.0 - 9.0 s.u.	LPDES General Permit LAG480000 (BPJ)*

Treatment: sewage treatment plant with chlorination

Monitoring Frequency: 1/6 months for all parameters at the point of discharge from the sewage treatment plant located on the east side of the facility

Limits Justification: Light Commercial Facilities General Permit LAG480000, Schedule A, BPJ, and similar discharges.

2. **Outfalls 004, 005, and 006 - once-through non-contact cooling water**
(estimated flow is Outfall 004 (006) - 2,330,000 gpd and Outfall 005 - 259,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	Existing Permit *
TOC	---:5 mg/L (NET)	Existing Permit *
Temperature	---:Report	Existing Permit *
TRC	---:Report	Existing Permit *
pH	6.0 - 9.0 s.u.	Existing Permit *

Treatment: none

Monitoring Frequency: 1/quarter for all parameters at the point of discharge from the solar heat and oil cooler exchangers

Limits Justification: Existing Permit, BPJ, and similar discharges.

- * Existing permits for similar outfalls
- BPJ Best Professional Judgement
- su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.k, stormwater discharges from facilities classified as SIC Code 1321 are considered to be associated with industrial activities. Therefore, an SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).

303(d)/TMDL WATERBODIES

Subsegment 070404 is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Mississippi River Basin, those suspected causes for impairment which are not directly attributed to the crude oil and natural gas processing plant category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Therefore, for the purposes of this permit, the pathogen indicators impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Pathogen Indicators

To protect against the further impairment of the pathogen indicator cause, a fecal coliform limit has been placed on Outfall 003.